

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE

2005 MAY 25 P 4:08

UNITED STATES OF AMERICA)

v.)

FRANK DEPERGOLA)

CRIMINAL ACTION NO. 05-30002-MAP

U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, through counsel, and requests this Honorable Court to modify his conditions of release to allow him to travel to Sussex, New Brunswick, Canada from May 29, 2005 to June 5, 2005; and asserts as his reasons therefore, defendant, Depergola, requests to travel to New Brunswick, Canada, with his family during the aforementioned dates.

The defendant has attached a copy of his itinerary to the within motion.

The Defendant,


By: 

Michael L. Foy, Esquire
935 Main Street
Springfield, MA 01103
(413) 781-1106
BBO#176920

CERTIFICATE OF SERVICE

I, Michael L. Foy, do hereby certify that I have on this date served a copy of the foregoing document to Assistance United States Attorney, Ariane D. Vuono, in hand of same to her at the United States District Court, 1550 Main Street, Springfield, MA 01103.

Date: May 25, 2005


Michael L. Foy, Esquire

ITINERARY- FRANK DEPERGOLA

Departure: Sunday, May 29, 2005

Destination: Oak Mountain Outfitters, Sussex, New Brunswick, Canada

Return: Sunday, June 5, 2005